

2. Before SYKES committed the offense charged in this count, he had a final conviction for a serious drug felony, namely, Possession of Heroin with Intent to Distribute, on or about February 22, 2013, in case number 12 00241-001, in the United States District Court, Western District of Pennsylvania, for which he served a term of imprisonment of more than 12 months, and was released within 15 years of the commencement of the instant offense.

COUNT 2

(Felon in Possession of a Firearm, 18 U.S.C. §§ 922(g)(1) and 924(a)(8))

The Grand Jury further charges:

3. On or about September 10, 2024, in the Northern District of Ohio, Eastern Division, Defendant LEONARD SYKES, knowing he had been previously convicted of crimes punishable by imprisonment for a term exceeding one year, those being: Possession of a Firearm by a Convicted Felon, on or about February 22, 2013, in case number 12 00077-001, in the United States District Court, Western District of Pennsylvania; Possession of Heroin with Intent to Distribute, on or about February 22, 2013, in case number 12 00241-001, in the United States District Court, Western District of Pennsylvania; and Trafficking in Heroin, on or about November 13, 2017, in case number 17 CR 411, in the Mahoning County, Ohio, Court of Common Pleas, knowingly possessed in and affecting interstate commerce a firearm, to wit: a Lorcin, Model: L32, semi-automatic pistol, Caliber: .32 Auto, bearing serial number 000225, said firearm having been shipped and transported in interstate and foreign commerce, in violation of Title 18, United States Code, sections 922(g)(1) and 924(a)(8).

COUNT 3

(Possessing a Firearm in Furtherance of a Drug Trafficking Crimes,
18 U.S.C. § 924(c)(1)(A)(i))

The Grand Jury further charges:

4. On or about September 10, 2024, in the Northern District of Ohio, Eastern Division, Defendant LEONARD SYKES knowingly possessed a firearm, to wit: a Lorcin, Model: L32, semi-automatic pistol, Caliber: .32 Auto, bearing serial number 000225, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that being: possession with intent to distribute cocaine, heroin, and fentanyl as charged in count 1 of this indictment, in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

FORFEITURE

The Grand Jury further charges:

5. For the purpose of alleging forfeiture pursuant to 21 U.S.C. § 853, 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c), the allegations of Counts 1 through 3, inclusive, are incorporated herein by reference. As a result of the foregoing offenses, Defendant LEONARD SYKES, shall forfeit to the United States any and all property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such violations; any and all property used or intended to be used, in any manner or part, to commit or to facilitate the commission of such violations; and, any and all firearms involved in or used in the commission of such violations.

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.